

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 21-CR-85-WMC-1

BARBARA BORTNER,

Defendant.

**AFFIDAVIT OF KRISTEN N. NELSON SUPPORTING THE DEFENDANT'S MOTION TO
RESCHEDULE THE PRESENTENCE REPORT DUE DATE**

KRISTEN N. NELSON, being first duly sworn, on oath deposes and states as follows:

1. I am an attorney admitted to practice law in the State and Federal Courts of Wisconsin.
2. I submit this affidavit in support of the defense motion to reschedule the presentence report (PSR) due date to March 14, 2022.
3. Following Attorney Patrick J. Knight's motion to adjourn sentencing, and this Court's granting of the motion, Defendant Barbara Bortner's sentencing in Case No. 21-CR-85-WMC-1 was adjourned to May 4, 2022.
4. On January 5, 2022, at the time this Court granted Attorney Knight's motion to adjourn sentencing in this matter from March 2, 2022 until May 4, 2022, this Court ordered the PSR due date was rescheduled to February 14, 2022, with objections due February 28, 2022.
5. Furthermore, in granting Attorney Knight's motion, this Court allowed him time to transfer this case to other attorneys within Gimbel, Reilly, Guerin & Brown, LLP.

6. I, along with Attorney Thomas E. Brown, have entered appearances in this case, and we intend to represent Ms. Bortner in all future proceedings.

7. In order to ensure that Attorney Brown and I are adequately briefed on this case and have time to meet with Ms. Bortner, so that Probation Officer Williams is provided with relevant information to be included in the PSR, I am respectfully requesting that the PSR due date be rescheduled to March 14, 2022, with objections to the PSR due on March 28, 2022.

8. Assistant United States Attorney Aaron Wagner and Probation Officer Richard Williams are aware of this request and do not have any objections.

Dated this 1st day of February 2022.

GIMBEL, REILLY, GUERIN & BROWN

By: /s/ Kristen N. Nelson

Kristen N. Nelson

State Bar No. 1090088

Attorneys for Defendant Barbara Bortner

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Subscribed and sworn to before me
this 1st day of February 2022.

s/ John C. Goudie

Notary Public, State of Wisconsin
My commission: August 21, 2024